

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOITH PAPER GMBH & CO. KG	:	
	:	Civil Action No. 07-226-JJF
Plaintiff,	:	
	:	
v.	:	
	:	
JOHNSONFOILS, INC.	:	
	:	
Defendant.	:	

**JOHNSONFOILS, INC.'S MOTION FOR AN ORDER
OF PROTECTION FROM THE MARCH 14, 2008 SUBPOENAS SERVED
BY VOITH PAPER GMBH & CO. KG**

JohnsonFoils, Inc. ("JohnsonFoils"), by and through its undersigned attorneys, respectfully moves for an Order of Protection from the March 14, 2008 Subpoenas served by Voith Paper GMBH & Co. KG ("Voith") on AstenJohnson, Inc., Abitibi Bowater, Inc., and International Paper Company. Support for this Motion is set forth in the accompanying Brief and Exhibits.

Respectfully submitted,

Seitz, Van Ogtrop & Green, P.A.

/s/ Patricia P. McGonigle

Dated: March 25, 2008

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*Attorneys for Defendant
JohnsonFoils, Inc.*

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JOHNSONFOILS, INC.	:	
	:	
Defendant.	:	

NOTICE OF MOTION

TO: All Parties and Counsel Appearing on the Attached
Certificate of Service

PLEASE TAKE NOTICE that JohnsonFoils, Inc. seeks to present its
Motion for An Order of Protection From the March 14, 2008 Subpoenas
Served by Voith Paper GMBH & Co. KG to the Court on Friday, **May 9, 2008**
at 10:00 a.m.

Dated: March 25, 2008

Respectfully submitted,

Seitz, Van Ogtrop & Green, P.A.

/s/ Patricia P. McGonigle

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Attorneys for JohnsonFoils, Inc.

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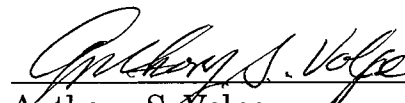
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Plaintiff,	:	
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	:	
Defendant.	:	

RULE 7.1.1 STATEMENT

Pursuant to Rule 7.1.1 of the Local Rules of the United States District Court for the District of Delaware, I hereby certify that counsel for Defendant, JohnsonFoils, Inc. ("JohnsonFoils"), has made a reasonable effort to reach agreement with counsel for Plaintiff, Voith Paper GMBH & Co. KG, on the matters set forth in JohnsonFoils's Motion for a Protective Order, and that the parties have not been able to reach agreement.

Respectfully submitted,

Dated: March 25, 2008



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PROPOSED ORDER

WHEREAS, Defendant, JohnsonFoils, Inc. (“JohnsonFoils”), has filed a Motion for Protective Order; and the Court having considered the respective papers submitted by Plaintiff, Voith Paper GMBH & Co. KG (“Voith”), and JohnsonFoils in support of, or in opposition to, said motion; and the Court having considered oral argument of counsel for the respective parties, if any; and the Court having considered the pleadings in this matter and the current status of the case; and for other good cause having been shown;

IT IS HEREBY ORDERED, on this _____ day of _____, 2008, that JohnsonFoils’ Motion is **GRANTED**, and all discovery concerning JohnsonFoils requested in Voith’s March 14, 2008 Subpoenas to AstenJohnson, Inc., AbitibiBowater, Inc., and International Paper Company is prohibited.

U.S.D.J.

CERTIFICATE OF SERVICE

I, Patricia P. McGonigle, Esquire, hereby certify that on this 25th day of March 2008, I electronically filed the foregoing pleading with the Clerk of Court using CM/ECF which will send notification of such filing to counsel of record. Further, I caused a copy of the foregoing pleading to be served upon the following counsel as noted

Plaintiff's Counsel:

Via Hand Delivery

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Third-Parties:

Via Federal Express

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Via Federal Express

International Paper Company
c/o The Corporation Company
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Via Federal Express

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